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Attorneys for FedEx Supply Chain Logistics & Electronics, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:)	
)	
GOODMAN NETWORKS, INC.,)	Case No. 23-31641-mvl-7
)	
Debtor.)	(Chapter 7)
)	

SCOTT M. SEIDEL, TRUSTEE,)	
)	
Plaintiff,)	Adversary Proceeding
)	No. 23-03091
v.)	
)	
FEDEX SUPPLY CHAIN LOGISTICS)	
& ELECTRONICS, INC.,)	
)	
Defendant.)	

**FEDEX SUPPLY CHAIN LOGISTICS & ELECTRONICS, INC.'S
CONSENT MOTION FOR LEAVE TO FILE BRIEFS
IN EXCESS OF PAGE LIMITS SET L.B.R 7007-2(C)**

1. Comes now FedEx Supply Chain Logistics & Electronics, Inc.'s ("FSCLE") and pursuant to L.B.R. 7007-2(c) moves for the Court for an order granting FSCLE and the Trustee leave to file briefs in excess of the twenty-five (25) page limit set forth in L.B.R. 7007-2(c).

2. As grounds for this motion, FSCLE would show the Court that the Trustee has filed a motion for preliminary injunction with a forty (40) page brief in support thereof and FSCLE intends to file a motion to dismiss the Trustee's adversary complaint. FSCLE seeks leave to file a brief of the same length already filed by the Trustee on the issue of the preliminary injunction, to file a brief of the same length in support of its motion to dismiss and for leave for the Trustee to file a principal reply brief in opposition to FSCLE's motion to dismiss that is also forty (40) total pages in length.

3. The legal issues raised by the Trustee and FSCLE are complex. These motions are more akin to a summary judgment than an ordinary bankruptcy motion. The page limits for a summary judgment under the local rules is fifty (50) pages. L.B.R. 7056-1(e)(2). Because these motions are closer to summary judgment motions than ordinary motions, FSCLE and the Trustee both seek leave to file briefs of an intermediate length – forty (40) total pages.

4. In support of this motion, FSCLE relies upon its memorandum of law filed herewith, the fact and length of the Trustee's brief in support of his motion for preliminary injunction, its lawsuit filed in the Northern District of Texas and all the pleadings in this adversary proceeding.

5. FSCLE further states that after consultation with counsel for the Trustee that this motion is unopposed and is in fact by consent.

6. WHEREFORE, for good cause shown, FSCLE moves for leave for both the Trustee and FSCLE to be granted leave to file principal briefs on the Trustee's motion for preliminary injunction and FSCLE's motion to dismiss that are forty (40) total pages.

Dated: January 10, 2024

Respectfully submitted,

BUTLER SNOW LLP

s/ Danny Van Horn

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Certificate of Consultation of Counsel

Prior to filing this motion, counsel for FSCLE (Danny Van Horn) consulted with counsel for the Trustee (Joshua Shepherd) on January 5, 8 and 9. As a result of those discussions, FSCLE can report that this motion is not opposed and is consented to by the Trustee.

s/ Danny Van Horn

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document was served concurrently with the filing of the same via the Court's CM/ECF electronic filing system upon all persons who have filed ECF appearances in this case and via email to Trustee's Counsel:

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s/ Danny Van Horn